

Hearing Date:
Objection Deadline:

March 31, 2011 at 10:00 a.m.
March 23, 2011 at 4:00 p.m.

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	}	Chapter 11 Case
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,		Case No. 08-13555 (JMP)
Debtors.		(Jointly Administered)

**JOINDER OF ERROL JOHN VOIGT IN THE RESPONSE OF THE ROYAL BANK OF
SCOTLAND PLC TO DEBTORS' EIGHTY-EIGHTH OBJECTION TO CLAIMS (NO
LIABILITY CLAIMS)**

Errol John Voigt ("Voigt") hereby joins in the Response of the Royal Bank of Scotland plc ("RBS") to Debtors' Eighty-Eighth Omnibus Objection to Claims (No Liability Claims), filed on March 15, 2011 [Docket No. 15039] ("Response").

BASIS FOR JOINDER AND BACKGROUND

1. On October 30, 2009, Voigt filed his proof of claim with respect to certain Preferred Securities (as defined in the Response), issued by Lehman Brothers UK Funding LP and guaranteed by Lehman Brothers Holdings plc ("LBH plc") under ISIN XS0229269856. The proof of claim filed by Voigt was assigned claim no. 59110 ("Claim"). See Exhibit "A."

2. Like the claims held by RBS described in the Response, Voigt's Claim is based on preferred securities included on the above-captioned debtors' ("Debtors") list of Lehman Program Securities and guaranteed by LBH plc.

3. As is set forth in paragraph 4 to the Response, on June 9, 2005, the Executive Committee of the Board of Directors of Lehman Brothers Holdings Inc. ("LBHI") adopted a

unanimous written consent resolution ("Resolution") by which LBHI fully guaranteed all obligations, liabilities and commitments of various LBHI subsidiaries, including LBH plc. See Exhibit D annexed to the Response.

4. The obligations of LBH plc that LBHI guaranteed include LBH plc's obligations as the guarantor of the securities. Therefore Voigt has a claim against LBHI as the ultimate guarantor of the securities and as the beneficiaries of LBHI's guarantee of LBH plc. Debtors' objection to the Claim must fail as it provides no evidentiary support for LBHI's assertion that it has no liability for the securities.

5. On February 11, 2011, Debtors filed their Eighty-Eighth Omnibus Objection to Claims (No Liability Claims) [Docket No. 14450] ("Objection") seeking, *inter alia*, to disallow the Voigt Claim.

6. Voigt joins in the Response to the Objection for all the reasons set forth in the Response, including on the grounds that the Resolution provides Voigt with a valid guarantee claim against LBHI.

7. Voigt reserves all of his rights, claims and defenses including, without limitation, the right to discovery in connection with the Objection.

WHEREFORE, Voigt hereby joins in the relief sought in the Response and requests the Court deny the Objection with respect to the Voigt Claim and grant such other relief as is just and proper.

Dated: New York, New York
March 23, 2011

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